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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

MARIA CONCEPCION NIETO DE)	Case No. 1:21-cv-00416 BAK (EPG)
GIANINI,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
Plaintiff,)	(ECF No. 22)
vs.)	
KILOLO KIJAKAZI, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 14-day extension of time, from May 19, 2022 to June 2, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S REPLY BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's third request for an extension of time. Plaintiff respectfully states that the requested extension is necessary as Plaintiff's Counsel has recently returned to San Francisco, California and requires the additional time to ensure the timely submission of briefing assignments currently on calendar. Counsel is catching up on past due assignments as she has been out of the state for several months due to her father's current health issues. For the week of

May 16, 2022 and May 23, 2022 Plaintiff's Counsel has seven merit briefs due and several EAJA stipulations due. Counsel requires additional time to brief the issues thoroughly for the Court's consideration. Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: May 27, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Dolly M. Trompeter
DOLLY M. TROMPETER
Attorneys for Plaintiff

Dated: May 27, 2022 PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

By: */s/ Frederick Fripps
Frederick Fripps
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on May 27, 2022)

ORDER

Based on the above stipulation (ECF No. 22), IT IS ORDERED that Plaintiff shall file Plaintiff's reply no later than June 2, 2022.

IT IS SO ORDERED.

Dated: May 31, 2022

/s/ Eric P. Gorsig
UNITED STATES MAGISTRATE JUDGE